

4242 MERRICK ROAD, MASSAPEQUA, NEW YORK 11758

NEIL H. GREENBERG, ESQ.

JUSTIN M. REILLY, ESQ.  
KEITH E. WILLIAMS, ESQ.  
VICTORIA SPAGNOLO, ESQ.

PARALEGALS

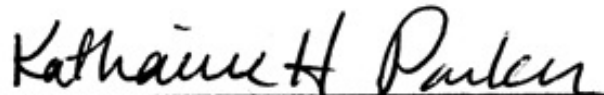
ROSA COLLINS  
CATALINA ROMAN

**Via: SDNY ECF**

**March 7, 2023**

Honorable Judge Katharine H. Parker  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl St.  
New York, NY 10007

**APPLICATION GRANTED**

  
**Hon. Katharine H. Parker, U.S.M.J.**

**03/07/2023**

**Re: *Calderon v. 326 Mobile of NJ Incorporated, et al.*; 22-cv-10401 (RA)(KHP)**

Dear Hon. Judge Parker,

I represent Plaintiff, Sabrina Calderon, in the above-referenced FLSA action. Kindly accept this correspondence requesting an adjournment of the March 9, 2023 initial conference *sine die*. This is Plaintiff's first such request.

Plaintiff initiated this action on December 8, 2022 by filing a Summons and Complaint against Defendants 326 Mobile of NJ Incorporated and Isaac Marashli. Shortly after filing the Complaint, however, Plaintiff decided that she did not want to proceed with a lawsuit and authorized my office to discontinue this case without prejudice. To that end, I filed a Notice of Voluntary Dismissal and a status letter on December 19, 2022. *See* DE 5, 6. Defendants were never served with the Summons and Complaint.

Given the procedural posture of the case, Plaintiff respectfully requests that the Court cancel the upcoming initial conference pending District Judge Ronnie Abrams' review and approval of Plaintiff's voluntary dismissal.

We thank the Court for its time and consideration of this request.

Respectfully submitted,



Keith E. Williams, Esq.